



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 30, 2021

BY CM/ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Michols Pena and Victor Rivera*, 20 Cr. 600 (AKH)

Dear Judge Hellerstein:

The Government respectfully requests an additional 45 days to file a superseding indictment in the above-captioned matter. During the parties' pretrial conference on April 5, 2021, the Court imposed a deadline of May 3, 2021 to file superseding charges. The Government has been dutifully investigating to meet the Court's deadline and currently anticipates seeking a superseding indictment. However, the Government requires additional time to [REDACTED]

[REDACTED] An additional 45 days will enable the Government to finish investigating this conduct and make a determination as to whether charges are warranted.¹

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/ Mathew Andrews
Mathew Andrews / Andrew K. Chan
Assistant United States Attorney
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Cc: Counsel for the Defendants (by CM/ECF)

¹ Because portions of this letter include information about an ongoing investigation into uncharged criminal conduct, the Government requests that the unredacted version of this letter be filed *ex parte* and under seal.